

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NEW MEXICO UNITED FOOD AND COMMERCIAL WORKERS UNION'S AND EMPLOYERS' HEALTH AND WELFARE TRUST FUND, on behalf of itself and all others similarly situated,	::	Civil Action No. 07-cv-6916-JGK-MHD
Plaintiff,	::	
v.	::	
PURDUE PHARMA L.P., <i>et al.</i> , Defendants.	::	
AMERICAN FED'N OF STATE, COUNTY & MUNICIPAL EMPLOYEES, DISTRICT COUNCIL 47 HEALTH AND WELFARE FUND, et al.,	::	Civil Action No. 07-cv-8761-JGK-MHD
Plaintiffs,	::	
v.	::	
PURDUE PHARMA L.P., and THE PURDUE FREDERICK COMPANY, INC.	::	
Defendants.	::	
	::	MOTION TO ADMIT COUNSEL PRO HAC VICE
	::	

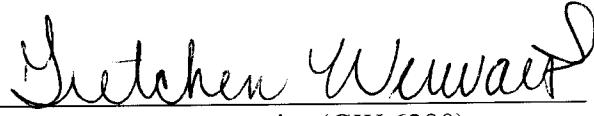
PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Gretchen N. Werwaiss a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Chilton Davis Varner
 Firm Name: King & Spalding
 Address: 1180 Peachtree Street, N.W.
 City/State/Zip: Atlanta, GA 30309
 Phone Number: 404-572-4789
 Fax Number: 404-572-5137

Chilton Davis Varner is a member in good standing of the Bar of the State of Georgia. There are no pending disciplinary proceeding against Chilton Davis Varner in any State or Federal court.

Dated: August 19, 2008
New York, New York

Respectfully submitted,



Gretchen N. Werwaiss (GW 6280)

(gwerwaiss@chadbourne.com)

CHADBOURNE & PARKE LLP

30 Rockefeller Plaza

New York, NY 10112

Telephone: (212) 408-5100

Facsimile: (212) 541-5369

Attorneys for Defendants Purdue Pharma

L.P., Purdue Pharma Inc., The Purdue

Frederick Company Inc. d/b/a The

Purdue Frederick Company, The P.F.

Laboratories, Inc., Michael Friedman,

Howard R. Udell, and Paul D.

Goldenheim

**UNITED STATES DISTRICT
SOUTHERN DISTRICT OF NEW YORK**

NEW MEXICO UNITED FOOD AND COMMERCIAL WORKERS UNION'S AND EMPLOYERS' HEALTH AND WELFARE TRUST FUND, on behalf of itself and all others similarly situated,

Plaintiff,
v.
PURDUE PHARMA L.P., *et al.*,
Defendants.

Civil Action No. 07-cv-6916-JGK-MHD

AMERICAN FED'N OF STATE, COUNTY &
MUNICIPAL EMPLOYEES, DISTRICT
COUNCIL 47 HEALTH AND WELFARE FUND,
et al..

Plaintiffs,
v.
PURDUE PHARMA L.P., and THE PURDUE
FREDERICK COMPANY, INC.
Defendants

Civil Action No. 07-cv-8761-JGK-MHD

**AFFIDAVIT OF GRETCHEN N.
WERWAISS IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE**

State of New York)
)
 County of New York) ss:

Gretchen N. Werwaiss, being duly sworn, hereby deposes and says as follows:

1. I am Counsel to the law firm of Chadbourne & Parke LLP, attorneys for Defendants Purdue Pharma L.P., Purdue Pharma Inc., The Purdue Frederick Company Inc. d/b/a The Purdue Frederick Company, The P.F. Laboratories, Inc., Michael Friedman, Howard R. Udell, and Paul D. Goldenheim in the above-captioned actions. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendants' motion to admit Chilton Davis Varner as counsel pro hac vice to represent Defendants Purdue Pharma L.P., Purdue Pharma Inc., The Purdue Frederick Company Inc. d/b/a The Purdue Frederick Company, The P.F.

Laboratories, Inc., Michael Friedman, Howard R. Udell, and Paul D. Goldenheim in these matters.

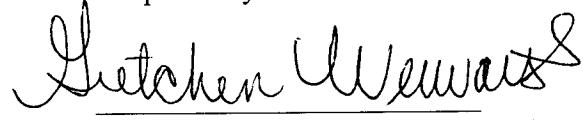
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1996. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Chilton Davis Varner for more than one year.
4. Ms. Chilton Davis Varner is a partner at King & Spalding in Atlanta, Georgia.
5. A certificate of good standing for Chilton Davis Varner is attached here to as **Exhibit A**.
5. I have found Ms. Chilton Davis Varner to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move for the admission of Chilton Davis Varner pro hac vice.
7. I respectfully submit a proposed order granting the admission of Chilton Davis Varner pro hac vice, which is attached hereto as **Exhibit B**.

WHEREFORE it is respectfully requested that the motion to admit Chilton Davis Varner pro hac vice, to represent Plaintiff in the above-captioned actions, be granted.

Dated: August 19, 2008

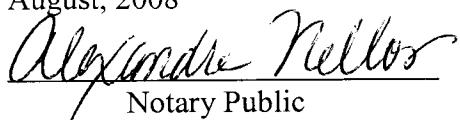
New York, New York

Respectfully submitted



Gretchen N. Werwaiss (GW 6280)

Sworn to me this 19th day of
August, 2008



Alexandra Nellor
Notary Public

ALEXANDRA NELLOR
Notary Public, State of New York
No. 08N050126419
Qualified in New York County
Commission Expires May 6, 2009

EXHIBIT A



STATE BAR OF GEORGIA

Lawyers Serving the Public and the Justice System

Ms. Chilton D. Varner
King & Spalding LLP
1180 Peachtree Street, N.E.
Atlanta, GA 30309-3521

CURRENT STATUS: Active Member-Good Standing
DATE OF ADMISSION: 06/22/1976
BAR NUMBER: 725450
TODAY'S DATE: August 18, 2008

Listed below are the public disciplinary actions, if any, which have been taken against this member:

State Disciplinary Board Docket #	Supreme Court Docket #	Disposition
N/A	N/A	N/A

The prerequisites for practicing law in the State of Georgia are as follows:

- Must be certified by the Office of Bar Admissions, either by Exam, or on Motion (Reciprocity).
- Sworn in to the Superior Court in Georgia, which is the highest court needed for individuals to practice law in the State of Georgia.
- Enrolled with the State Bar of Georgia, which is an arm of the Supreme Court of Georgia.

Attorneys licensed in Georgia and whose membership is current are eligible to practice law in Superior Court. Attorneys may, upon application, apply for admission to the Supreme, District and State Court of Appeals.

Under the privacy/confidentiality provision of the Bar Rule 4-221(d), any complaint against a member resolved prior to the filing and docketing of a disciplinary case in the Supreme Court is not a matter of public record, and may not be revealed without a waiver from the member. It is the policy of the State Bar of Georgia to answer any inquiry about a member by disclosing only those complaints that have been docketed in the Supreme Court. With respect to matters that are currently pending as active, undocketed cases, when an inquiry is received, the State Bar of Georgia shall not disclose the existence of those complaints. Such non-disclosure should not be construed to confirm the existence of confidential complaints since the vast majority of members in good standing are not the subjects of such confidential complaints.

This member is currently in "good standing" as termed and defined by State Bar Rule 1-204. The member is current in license fees and is not suspended or disbarred as of the date of this letter.



STATE BAR OF GEORGIA

Official Representative of the State Bar of Georgia

HEADQUARTERS

104 Marietta Street, Suite 100
Atlanta, Georgia 30303
(404) 527-8700 ■ (800) 334-6865
FAX (404) 527-8717
www.gabar.org

SOUTH GEORGIA

244 E. Second Street (Zip 31794)
P.O. Box 1390
Tifton, Georgia 31793-1390
(229) 387-0446 ■ (800) 330-0446
FAX (229) 382-7435

EXHIBIT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NEW MEXICO UNITED FOOD AND COMMERCIAL WORKERS UNION'S AND EMPLOYERS' HEALTH AND WELFARE TRUST FUND, on behalf of itself and all others similarly situated,	::	
Plaintiff,	::	Civil Action No. 07-cv-6916-JGK-MHD
v.	::	
PURDUE PHARMA L.P., <i>et al.</i> ,	::	
Defendants.	::	
AMERICAN FED'N OF STATE, COUNTY & MUNICIPAL EMPLOYEES, DISTRICT COUNCIL 47 HEALTH AND WELFARE FUND, et al.,	::	Civil Action No. 07-cv-8761-JGK-MHD
Plaintiffs,	::	
v.	::	
PURDUE PHARMA L.P., and THE PURDUE FREDERICK COMPANY, INC.	::	
Defendants.	::	ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION
	::	
	::	

Upon the motion of Gretchen N. Werwaiss, attorney for Defendants Purdue Pharma L.P., Purdue Pharma Inc., The Purdue Frederick Company Inc. d/b/a The Purdue Frederick Company, The P.F. Laboratories, Inc., Michael Friedman, Howard R. Udell, and Paul D. Goldenheim, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name:	Chilton Davis Varner
Firm Name:	King & Spalding
Address:	1180 Peachtree Street, N.W.
City/State/Zip:	Atlanta, GA 30309
Phone Number:	404-572-4789
Fax Number:	404-572-5137
E-mail:	cvarner@kslaw.com

is admitted to practice pro hac vice as counsel for Defendants Purdue Pharma L.P., Purdue Pharma Inc., The Purdue Frederick Company Inc. d/b/a The Purdue Frederick Company, The P.F. Laboratories, Inc., Michael Friedman, Howard R. Udell, and Paul D. Goldenheim in the above-captioned actions in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

City, State:

United States District/Magistrate Judge

FOR OFFICE USE ONLY: FEE PAID \$

SDNY RECEIPT#

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NEW MEXICO UNITED FOOD AND
COMMERCIAL WORKERS UNION'S AND
EMPLOYERS' HEALTH AND WELFARE TRUST
FUND, on behalf of itself and all others similarly
situated,

Plaintiff,

v.

PURDUE PHARMA L.P., *et al.*,
Defendants.

:: Civil Action No. 07-cv-6916-JGK-MHD

AMERICAN FED'N OF STATE, COUNTY &
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COUNCIL 47 HEALTH AND WELFARE FUND,
et al.,

Plaintiffs,

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PURDUE PHARMA L.P., and THE PURDUE
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Defendants.

:: Civil Action No. 07-cv-8761-JGK-MHD

:: ORDER FOR ADMISSION
:: PRO HAC VICE
:: ON WRITTEN MOTION

Upon the motion of Gretchen N. Werwaiss, attorney for Defendants Purdue Pharma L.P.,
Purdue Pharma Inc., The Purdue Frederick Company Inc. d/b/a The Purdue Frederick
Company, The P.F. Laboratories, Inc., Michael Friedman, Howard R. Udell, and Paul D.
Goldenheim, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Chilton Davis Varner
Firm Name: King & Spalding
Address: 1180 Peachtree Street, N.W.
City/State/Zip: Atlanta, GA 30309
Phone Number: 404-572-4789
Fax Number: 404-572-5137
E-mail: cvarner@kslaw.com

is admitted to practice pro hac vice as counsel for Defendants Purdue Pharma L.P., Purdue Pharma Inc., The Purdue Frederick Company Inc. d/b/a The Purdue Frederick Company, The P.F. Laboratories, Inc., Michael Friedman, Howard R. Udell, and Paul D. Goldenheim in the above-captioned actions in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

City, State:

United States District/Magistrate Judge

FOR OFFICE USE ONLY: FEE PAID \$

SDNY RECEIPT#

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

NEW MEXICO UNITED FOOD AND COMMERCIAL WORKERS UNION'S AND EMPLOYERS' HEALTH AND WELFARE TRUST FUND, on behalf of itself and all others similarly situated,

Plaintiff,

-v-

PURDUE PHARMA L.P., PURDUE PHARMA, INC., THE PURDUE FREDERICK COMPANY, INC. d/b/a THE PURDUE FREDERICK COMPANY, P.F. LABORATORIES, INC., ABBOTT LABORATORIES, ABBOTT LABORATORIES, INC., MICHAEL FRIEDMAN, HOWARD R. UDELL, PAUL D. GOLDENHEIM, JOHN DOE Nos. 1 through 20, and JANE DOE Nos. 1 through 20,

Defendants.

AMERICAN FEDERATION OF STATE, COUNTY AND MUNICIPAL EMPLOYEES, DISTRICT COUNCIL 47 HEALTH AND WELFARE FUND, et al.,

Civil Action No. 07-cv-8761-JGK-MHD

Plaintiffs,

-v-

PURDUE PHARMA L.P. and THE PURDUE FREDERICK COMPANY INC.,

Defendants.

CERTIFICATE OF SERVICE

I, Alexandra K. Nellos, hereby certify that on August 20, 2008, I electronically served the following documents on William D. Marvin, Christopher

Seeger, Jonathan Shub and Justin Bloom, counsel for Plaintiffs, and on Michael Colbert Hartmere, M. King Hill, III, and Mark D. Maneche, counsel for Abbott Laboratories and Abbott Laboratories, Inc by electronic transmission to the following e-mail addresses, wmarvin@cprlaw.com, cseeger@seegerweiss.com, jshub@seegerweiss.com; bloomesql@gmail.com; MCHartmere@Venable.com; mdmaneche@venable.com; and mkhill@venable.com:

- Motion to Admit Counsel (Chilton Davis Varner) Pro Hac Vice and related papers

Dated: August 20, 2008



Alexandra K. Nellos